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12 *International Payroll Company, LP*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 EDWARD ORDONEZ, an Individual,  
16 Plaintiff,

17 v.

18 BRINKER NEVADA, INC. dba CHILI'S  
19 GRILL & BAR  
20 Defendant.

Case No. **Case No.: 2:19-cv-01095 JAD-GWF**

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(First Request)**

21 Defendant Brinker International Payroll Company, LP, (erroneously sued as Brinker  
22 Nevada, Inc. dba Chili's Grill & Bar) ("Defendant"), by and through its counsel, Jackson Lewis  
23 P.C., and Plaintiff Edward Ordonez ("Plaintiff") by and through his counsel, Watkins & Letofksy,  
24 LLP, hereby stipulate and agree to extend the time for Defendant to file a response to Plaintiff's  
25 Complaint. Defendant's response is due on July 19, 2019. However, the parties are presently  
26 discussing the appropriate forum for this case considering an Agreement to Arbitrate executed by  
27 the parties, pursuant to which Defendant reserves all rights, remedies and defenses to pursue  
28 arbitration.

In the interest of avoiding the time and expense of potentially unnecessary motion practice,  
Plaintiff and Defendant have agreed to extending the deadline for Defendant to file a response to  
the Complaint up to and including August 2, 2019.

1 This stipulation and order is sought in good faith and not for the purpose of delay. No  
2 prior request for any extension of time has been made.

3 Dated this 18th day of July, 2019.

4 **JACKSON LEWIS P.C.**

**WATKINS & LETOFSKY, LLP**

5 /s/ Deverie Christensen

/s/ Eran Foster

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9 *Attorneys for Defendant*  
*Brinker International Payroll Company, LP*

*Attorneys for Plaintiff Edward Ordonez*

10  
11 **ORDER**

12 **IT IS SO ORDERED.**

13 

14 UNITED STATES MAGISTRATE JUDGE

15 Dated: July 19, 2019